

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff.

– v. –

SIMON PIERS THURLOW, ROGER  
LEON FIDLER, RICHARD ORAVEC,  
BRADLEY FIDLER, BRYCE EMORY  
BOUCHER, JOSEPH D. JORDAN and  
WESTERN BANKERS CAPITAL INC.,

Defendants.

Case No. 1:21-cv-07700-VSB-SN

**NOTICE OF MOTION FOR  
JUDGMENT ON PLEADINGS**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Nicolas Morgan, executed on April 8, 2025, and the exhibits attached thereto, the accompanying memorandum of law, and all pleadings herein, Defendants Joseph D. Jordan and Western Bankers Capital, Inc. (“Defendants”), by their undersigned counsel, hereby move before the Honorable Vernon S. Broderick, United States District Judge, at the Thurgood Marshall United States Courthouse for the Southern District of New York, 40 Foley Square, Courtroom 518, New York, New York, for an order, pursuant to Fed. R. Civ. P. 12(c), granting Defendants judgment on the pleadings, dismissing the Complaint in its entirety with prejudice.

PLEASE TAKE FURTHER NOTICE that Plaintiff’s opposition papers, if any, and Defendants’ reply papers, if any, shall be filed in accordance with Local Rule 6.1(b).

Dated: New York, New York  
April 10, 2025

BOIES SCHILLER FLEXNER LLP

By: /s/ John T. Zach  
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*Attorney for Defendants  
Joseph D. Jordan and Western  
Bankers Capital, Inc.*

Dated: Los Angeles, California  
April 10, 2025

INVESTOR CHOICE ADVOCATES  
NETWORK

By: /s/ Nicolas Morgan  
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